

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: Carrie Hudson

Debtor(s)

THE BANK OF NEW YORK MELLON
TRUST COMPANY, N.A. FKA THE
BANK OF NEW YORK TRUST COMPANY,
N.A. AS SUCCESSOR TO
JPMORGAN CHASE BANK, AS TRUSTEE
FOR RESIDENTIAL ASSET
MORTGAGE PRODUCTS, INC. MORTGAGE
ASSET-BACKED
PASS-THROUGH CERTIFICATES SERIES
2006-RP1, or its Successor or Assignee

Movant

vs.

Kenneth E. West, Trustee
Carrie Hudson

Respondent(s)

Chapter 13

Bankruptcy No. 23-12364-pmm

ORDER

Upon consideration of the objection of Creditor to confirmation of the Chapter 13 plan,
and after notice and hearing, it is hereby

ORDERED that the objection is sustained.

BY THE COURT,

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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THE BANK OF NEW YORK MELLON
TRUST COMPANY, N.A. FKA THE BANK
OF NEW YORK TRUST COMPANY, N.A. AS
SUCCESSOR TO JPMORGAN CHASE
BANK, AS TRUSTEE FOR RESIDENTIAL
ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-
THROUGH CERTIFICATES SERIES 2006-
RP1, or its Successor or Assignee

Movant

vs.

Kenneth E. West, Trustee
Carrie Hudson

Respondent(s)

Chapter 13

Bankruptcy No. 23-12364-pmm

AMENDED OBJECTION TO PLAN

THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK
OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE
BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1
("Creditor") is a secured creditor of the above Debtor and by its counsel hereby objects to the
Debtor's Chapter 13 Plan ("Plan") as follows:

1. Creditor filed a Proof of Claim number 9-1 on October 16, 2023 with respect to
its secured interest in real property of the Debtor or of the estate which is commonly known as
and located at 1506 South Corlies Street, Philadelphia, Pennsylvania 19146 ("Property"); such
Proof of Claim indicates a total debt claim of \$15,836.94.

2. Creditor objects as Debtor's Plan does not state what the treatment of the real
estate taxes and homeowners' insurance will be going forward.

WHEREFORE, for the foregoing reasons, THE BANK OF NEW YORK MELLON

TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1 requests that Debtor's plan be amended to reflect Debtor's payment of real estate taxes and homeowners' insurance going forward.

/s/ Andrew M. Lubin

ANDREW M. LUBIN, ESQUIRE ID # 54297

Attorney for THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1

1420 Walnut Street, Suite 1501

Philadelphia, PA 19102

Telephone: (215) 790-1010

Facsimile: (215) 790-1274

Email: ecfmail@mwc-law.com

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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THE BANK OF NEW YORK MELLON TRUST
COMPANY, N.A. FKA THE BANK OF NEW YORK
TRUST COMPANY, N.A. AS SUCCESSOR TO
JPMORGAN CHASE BANK, AS TRUSTEE FOR
RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC.
MORTGAGE ASSET-BACKED PASS-THROUGH
CERTIFICATES SERIES 2006-RP1, or its Successor or
Assignee

Movant

vs.

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Respondent(s)

Chapter 13

Bankruptcy No. 23-12364-pmm

CERTIFICATION OF SERVICE OF AMENDED OBJECTION TO PLAN

I, Andrew M. Lubin, attorney for THE BANK OF NEW YORK MELLON TRUST COMPANY, N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1, hereby certify that I served a true and correct copy of the foregoing Objection to Plan, by United States Mail, first class, postage prepaid, and/or electronic means, upon the following:

Date Served: March 20, 2024

Carrie Hudson
1506 S. Corlies St
Philadelphia, PA19146

MICHELLE LEE
Dilworth Paxson
1500 Market Street
Suite3500E
Philadelphia, PA 19102
Attorney for Debtor

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA19107
Trustee

United States Trustee
Office of United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA19107

/s/ Andrew M. Lubin

ANDREW M. LUBIN, ESQUIRE ID # 54297

Attorney for THE BANK OF NEW YORK MELLON TRUST COMPANY,
N.A. FKA THE BANK OF NEW YORK TRUST COMPANY, N.A. AS
SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE FOR
RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC. MORTGAGE
ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2006-RP1
1420 Walnut Street, Suite 1501
Philadelphia, PA 19102
Telephone: (215) 790-1010
Facsimile: (215) 790-1274
Email: ecfmail@mwc-law.com